

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

T. MONTANA BELL; RONNIE E. JOHNSON; ANGEL MALDONADO; KAREEM MAZYCK, on their own behalf and on behalf of all others similarly situated.

Plaintiffs,

V.

GEORGE M. LITTLE, Et al.

Defendants.

Case No. 2:22-cv-01516-CRE

ELECTRONICALLY FILED

JURY TRIAL DEMANDED

NOTICE

This Notice is submitted pursuant to this Court’s Order of June 2, 2023 that “Plaintiffs shall file a Notice with the Court by 6/9/2023 indicating the date they expect to have the motion seeking leave to file a Second Amended Complaint filed.” ECF No. 67.

Plaintiffs intend to file a motion seeking leave to file a Second Amended Complaint no later than August 1, 2023.

Plaintiffs in this matter have raised numerous constitutional and statutory claims, are seeking class certification, and have alleged copious facts serving as the bases for these claims. Counsel have been diligently investigating these facts and claims while communicating with Plaintiffs, and anticipate needing several more weeks to finalize factual investigation, drafting, and reviewing and revising the proposed Second Amended Complaint with Plaintiffs. This timeframe allows for counsel to complete the necessary legal correspondence, legal calls, and visitation with clients who are now no longer all in the same prison (one has been released; one is at SCI Phoenix) and to incorporate feedback so that the eventual filing has their joint approval.

Respectfully submitted,

/s/ Bret Grote

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/s/ Matthew A. Feldman

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CERTIFICATE OF SERVICE

I hereby certify that I served a copy of this Notice upon all defendants via ECF.

/s/ Bret Grote

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Dated: June 9, 2023